REMARKS

This Application has been carefully reviewed in light of the Final Office Action dated May 16, 2008 (*"Office Action"*). In the Office Action, Claims 1-20 are pending and rejected. Applicants respectfully request reconsideration and favorable action in this case.

Section 103 Rejections

The Office Action rejects Claims 1-17 and 19 under 35 U.S.C. §103(a) as being unpatenable over U.S. Patent Application Publication No. 2006/0059107 issued to Elmore et al. (*"Elmore"*) in view of U.S. Patent Application Publication No. 2004/0002955 issued to Gadbois et al. (*"Gadbois"*), and further in view of U.S. Patent Application Publication No. 2008/0109897 issued to Moran et al. (*"Moran"*). Applicants respectfully traverse these rejections for the reasons discussed below.

Independent Claim 1 of the present Application, as amended, recites:

> A method for use in a Web Services arrangement comprising:
> arranging User object(s) under a repository layer comprising one or more Repository objects collectively forming a Prefix, each User object representing a Web Services account;
> arranging Business Entity object(s) under User object(s);
> arranging corresponding TModel object(s) under at least one of User object(s), Repository object and Prefix;
> receiving a request to modify an object from a user;
> matching a distinguished name associated with the user and at least a portion of the distinguished name associated with the object;
> providing the user access to the object in response to matching the distinguished name associated with the object and the distinguished name associated with the user; and
> modifying the object as requested by the user in response to the user accessing the object.

Whether considered alone or in combination, the cited references do not disclose, teach, or suggest this combination of claim elements.

For example, the proposed *Elmore-Gadbois-Moran* combination does not disclose, teach, or suggest "matching a distinguished name associated with the user and at least a portion of the distinguished name associated with the object" and "providing the user access

to the object in response to matching the distinguished name associated with the object and the distinguished name associated with the user," as recited in Claim 1. In the *Office Action*, the Examiner acknowledges that the recited claim elements are not disclosed in *Elmore* in view of *Gadbois*. (*Office Action*, page 3). It is the Examiner's position, however, that the additional disclosure of *Moran* discloses Applicants' "matching" and "providing" steps. (*Office Action*, page 3). Applicants respectfully disagree.

Moran discloses that "Access Control Lists (ACLs) are used to describe the permitted actions (permissions) on protected network computer system resources or objects associated with a client or user identity." (*Moran*, Abstract). Specifically, *Moran* discloses that an "Authorization Service (21) uses a central database that lists all resources in the secure domain and the ACL and POP policies assigned (attached) to each resource." (*Moran*, page 3, paragraph 60). According to *Moran*, "[t]his master authorization policy (31) database and the user registry (containing user and group accounts) are the key components that help define a network security policy." (*Moran*, page 3, paragraph 60). *Moran* further discloses that the "ACL policy is made up of one or more entries that include user specific permissions or rights." (*Moran*, page 3, paragraph 62). "ACL policies provide the Authorization Service with information to make a "yes" or "no" answer on a specific request to access a protected object, and to perform some operation on that object." (*Moran*, page 3, paragraph 62). An example ACL is shown in Figure 5 and merely includes "user and group designations, and their specific permissions." (*Moran*, page 4, paragraph 70). Thus, *Moran* merely relates to storing in a central database a list that identifies a user by user name and associates with the user name the objects that the user has permission to access.

For modification of an object by a user, *Moran* discloses:

> When a client or user initially requests permission to perform an action on a protected object, such as requesting to "read" or "modify" a protected system file, the client's ID is first authenticated by the authentication service. This results in a set of credentials being created, including the authenticated user's ID or user name, a list of user groups to which the user may belong, the name of the protected object being requested, and the action being requested. For example, the credentials and authorization request for Bill Smith of ABC Corporation . . . attempting to "modify" a

protected system file "ABC_401k_summaries" may contain parameters such as:

B_Smith, ABC_employees, "modify", "ABC_401k_summaries".

(*Moran*, page 3, paragraphs 46-47). After the creation of the credentials and authorization request, *Moran* discloses that the "user ID From the authenticated credentials is matched (91) with the requested protected object's ACL entries." (*Moran*, page 6, paragraph 115). Thus, according to the disclosure of *Moran*, the Authorization Service receives a user request identifying a user by a user name and a requested object. Then, "the userID from the authenticated credentials is matched (91) with the requested protected object's ACL entries." (*Moran*, page 6, paragraph 115). Thus, the Authorization Service looks up the user name in the ACL, which is stored in a centralized database. "The permissions granted (93) are those in the matching entry or entries." (*Moran*, page 6, paragraph 115).

Accordingly, the "matching" referred to in *Moran* merely includes using a list to associate an object with a user to give that user permission to access the object. Applicants respectfully submit that accessing a list that includes a user name and a user object to which that user has access is not analogous to "matching a distinguished name associated with the user and **at least a portion of the distinguished name associated with the object**" and "providing the user access to the object in response to matching **the distinguished name associated with the object** and the distinguished name associated with the user," as recited in Claim 1. There is no disclosure in *Moran* that one would be able to match the name of the user with at least a portion of the name of the object. In fact, and as discussed above, *Moran* actually discloses the credentials and authorization request for Bill Smith of ABC Corporation . . . attempting to "modify" a protected system file "ABC_401k_summaries" merely include "B_Smith, ABC_employees, "modify", "ABC_401k_summaries". Thus, the name of the user is "Bill Smith" or "B_Smith" and the name of the file is "ABC_401k_summaries." The name of the file "ABC_401k_summaries" does not include the name of the user and cannot be matched with "B_Smith." Accordingly, *Moran* and the proposed *Elmore-Gadbois-Moran* combination does not disclose, teach, or suggest "matching a distinguished name associated with the user and **at least a portion of the distinguished name associated with the object**" and "providing the user access to the object in response to

matching **the distinguished name associated with the object** and the distinguished name associated with the user," as recited in Claim 1.

For at least these reasons, Applicants request reconsideration and allowance of Claim 1, together with Claims 2-7 and 17 that depend on Claim 1.

The Examiner also relies upon the proposed *Elmore-Gadbois-Moran* combination reject independent Claim 8. However, Claim 8 recites "code for matching a distinguished name associated with the user and at least a portion of the distinguished name associated with the object" and "code for providing the user access to the object in response to matching the distinguished name associated with the object and the distinguished name associated with the user" and "code for modifying the object as requested by the user in response to the user accessing the object." Therefore, for reasons analogous to those discussed above with regard to Claim 1, Applicants respectfully contend that Claim 8 is allowable over the proposed *Elmore-Gadbois-Moran* combination. For at least these reasons, Applicants request reconsideration and allowance of Claim 8, together with Claims 9-16 and 19 that depend on Claim 8.

The Office Action rejects Claims 18 and 20 under 35 U.S.C. §103(a) as being unpatenable *Elmore* in view *Gadbois* and *Moran* as applied to Claims 1-17 and 19 above, and further in view of U.S. Patent Application Publication No. 2003/0236956 issued to Grubbs et al. ("*Grubbs*"). Applicants respectfully request reconsideration and allowance of Claims 18 and 20 for the reasons discussed below.

Dependent Claims 18 and 20 depend upon independent Claims 1 and 8, respectively, which Applicant has shown above to be allowable. Accordingly, dependent Claims 2-7 and 9-16 are not obvious over the proposed *Elmore-Gadbois-Moran-Grubbs* combination at least because Claims 18 and 20 include the limitations of their respective independent claims. Since Claims 18 and 20 incorporate the limitations of their respective independent claims, Applicant has not provided detailed arguments with respect to Claims 18 and 20. However, Applicant remains ready to do so if it becomes appropriate. Applicant respectfully requests reconsideration and allowance of Claims 18 and 20.

CONCLUSION

Applicants have made an earnest attempt to place this case in condition for allowance. For the foregoing reasons, and for other apparent reasons, Applicants respectfully request full allowance of all pending Claims.

If the Examiner feels that a telephone conference or an interview would advance prosecution of this Application in any manner, the undersigned attorney for Applicants stands ready to conduct such a conference at the convenience of the Examiner.

Applicants believe no fee is due. However, should there be a fee discrepancy, the Commissioner is hereby authorized to charge any required fees or credit any overpayments to Deposit Account No. 02-0384 of Baker Botts L.L.P.

Respectfully submitted,

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